

EXHIBIT P-13

Declaration of Luis Gallegos

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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH
CENTRAL DIVISION

Luis Gallegos Plaintiff, vs. LVNV Funding LLC; Constantino Law Office P.C.; and Gregory Constantino, Defendants.	DECLARATION OF LUIS GALLEGOS Case Number: 2:14-cv-00516-BCW Magistrate Judge: Brooke C. Wells
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I, Luis Gallegos Jr., hereby declare that if called as a witness I would testify to the following under oath:


1. I am Luis Erick. Gallegos and I reside at 2261 N 450 W, Clearfield, Utah 84015.
2. For a few years prior to filing this lawsuit, I received letters from Constantino Law Office and Gregory Constantino stating that they are trying to collect a debt from me.
3. I called the Constantino Defendants several times over the years to inform them they are trying to collect from the wrong Luis Gallegos.
4. After I told them they are collecting from the wrong Luis Gallegos, Defendants continued sending me letters trying to collect the debt from me.

5. After I told them they are collecting from the wrong Luis Gallegos, Defendants filed two lawsuits against me trying to collect a debt I do not owe.
6. My father's name is Luis Benjamin Gallegos.
7. My father has never resided at my 2261 N 450 W, Clearfield, Utah 84015 address.
8. At the time of the two lawsuits against me, my father did not reside in Davis County, Utah.
9. At the time of the first lawsuit, my father resided outside the United States in Mexico.
10. At the time of the second lawsuit, my father resided outside the United States in Mexico.
11. I do not owe the debt for which the Defendants sued me.
12. When I was served with the first lawsuit against me by the Defendants, I told the officer serving me I was not responsible for the debt.
13. I also told the officer my father, Luis Gallegos Sr., did not live at my address.
14. The officer became irate and told me that I was required to sign the paperwork and resolve the matter in court.
15. After I was served with the first lawsuit, I filed an answer with the court so the Defendants would stop collecting the debt from me.
16. In my answer, I told the Defendants and the court that I was not the debtor and that my father did not reside at my address.

17. When I was served with the second lawsuit against me by the Defendants, I again told the officer I was not the Luis Gallegos that owed the debt and that my father did not reside at my address.
18. After I was served with the second lawsuit against me, I called the Defendants twice to tell them again that they were suing the wrong person, to stop the debt from being reported in my credit reports, to avoid having my wages garnished, and to avoid being arrested.
19. I also sent the Defendants a cease and desist letter to stop the collection against me.
20. I then received a letter from the Defendants telling me they were going to start garnishing my paycheck.
21. Over the years, the debt the Defendants tried to collect from me has been reporting on my credit reports in my name.
22. I was forced to engage an attorney to try to resolve this matter and stop the collections, credit reporting, lawsuits, and garnishments against me for a debt I did not owe.

I declare under criminal penalty of the State of Utah that the foregoing is true and correct.

Executed on: 07/15/15


Luis Gallegos Jr.